

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

**SERVICIOS DE DESCUENTO EN
COMPRA, INC.**

DEBTOR

CASE NO. 09-00832 (SEK)

CHAPTER 11

**MOTION TO COMPEL PAYMENT OF ADMINISTRATIVE EXPENSES AND
OBJECTIONS TO AMENDED DISCLOSURE TO THE CHAPTER 11 PLAN**

TO THE HONORABLE COURT:

COME NOW, PJAY Investment Corp., creditor and landlord, through the undersigned attorney who very respectfully alleges, states and prays as follows:

- 1- The appearing creditor file a motion seeking the payment of \$28,000.00 of administrative expenses. See docket 391. The debtor has not opposed in writing to Pjay's request.
- 2- However, during the hearing held on June 29, 2010, the debtor acknowledged part of the claim (\$20,000.00) and disputed the other \$8,000.00 being claimed, but agreed to resolve the matter extrajudicially.
- 3- At the moment, the parties have not reach an agreement as to the sums owed and the disclosures to the amended plan fails to mention any debt, contested or not, nor provide any remedy in order to address Pjay's claim for payment of administrative expenses.
- 4- Accordingly, it is respectfully requested from this Honorable Court to order, as unopposed, the payment of \$28,000.00 and/or order's debtor to amend its plan.

WHEREFORE, the appearing creditor respectfully requests that this Honorable

Court grant this motion and/or any other relief that it might deem proper.

IT IS HEREBY CERTIFY that on this same date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsels of record.

RESPECTFULLY SUBMITTED.

In Carolina, Puerto Rico, August 11, 2010.

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